



July 31, 2017

Wayne Kino  
Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**ATTN: TITLE V REPORTS**

**RE: SEMI-ANNUAL MONITORING REPORT: JANUARY - JUNE 2017  
CITY OF SANTA ROSA WASTEWATER TREATMENT FACILITY  
TITLE V - MAJOR FACILITY REVIEW PERMIT #A1403 (Permit)**

Dear Mr. Kino:

In compliance with Permit Standard Conditions Section F, this letter is provided to fulfill semi-annual monitoring reporting required for the City of Santa Rosa Wastewater Treatment Facility during the period January 1, 2017 – June 30, 2017. Pursuant to the monitoring requirements specified in the Permit, please note the following:

- During this period, monthly portable tests were conducted by Blue Sky Environmental for emissions from digester/natural gas fueled internal combustion engines S-200, S-201, S-202 and S-203 on January 27<sup>th</sup>, February 24<sup>th</sup>, March 31<sup>st</sup>, April 26<sup>th</sup>, May 24<sup>th</sup>, and June 29<sup>th</sup> of 2017. All monthly test showed engines operating within permitted limits, with the following exception:
  - Engines 3 and 4 (S-202 and S-203) were not tested on April 26<sup>th</sup> as they were out of service.
- One Notice of Violation was issued in this timeframe:
  - Notice of Violation A56117 was issued on April 12, 2017. Wednesday March 15, 2017 maintenance work was occurring on the gas line for digester number 3 (S-190) that required the valve from the digester to the flare to be opened. Because the automated ignition system on the flare is triggered by high dome pressure in the digesters, the automatic ignition was not triggered and the flare did not light. This resulted in the unintentional release of unabated digester gas for 4 hours and 44 minutes.
    - Immediate Corrective Action was taken as soon as staff became aware of the situation. The flare ignition system was switched to manual mode and the flare was lit for the remainder of the maintenance activity. The City is also reviewing the existing SCADA alarm system, procedures, and effectiveness improvements.
    - Following this event, the City's Standard Operating Procedure (SOP) for manual flare operation was immediately reviewed with City staff responsible for the shutdown operation that day.
    - The City notified the District and supplied a 10 day and 30 day response, as well as a 10 day response the NOV.

Santa Rosa Water  
69 Stony Circle • Santa Rosa, CA 95401  
Tel: (707) 543-4200 • Fax: (707) 543-3936

Mr. Kino  
January 26, 2016  
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This document and any attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. I declare under penalty of perjury under the laws of the state of California that the foregoing is true and accurate.

Sincerely,



Bennett Horenstein  
Director of Santa Rosa Water

cc. BAAQMD File